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**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

ERICA BARROW, an individual,

Plaintiff,

vs.

HELICOPTER PARTS INTERNATIONAL,
INC, a Nevada corporation; HARRY
NIWRANSKI, an individual; ANTHONY
MAGNOTTA; DOES I through X, inclusive;
and ROE CORPORATIONS I through X,
inclusive.

Defendants.

Case No. 3:20-cv-00528-MMD-CLB

**STIPULATION AND [PROPOSED]
ORDER TO EXTEND DEADLINE FOR
PLAINTIFF TO RESPOND TO MOTIONS
TO DISMISS**

(First Request)

Plaintiff Erica Barrow (“Barrow”) and Defendants Helicopter Parts International, Inc. (“HPI”), Harry Niwranski (“Niwranski”), and Anthony Magnotta (“Magnotta”) (collectively, when possible, “Defendants”), by and through their respective counsel, hereby submit the following Stipulation and [Proposed] Order to Extend Deadline for Plaintiff to Respond to Motions to Dismiss.

Defendants filed two motions to dismiss the Complaint—one on October 29, 2020 (ECF

#11) and one on November 2, 2020 (ECF #12). The current deadlines for Plaintiff's responses are November 12, 2020 and November 16, 2020. Plaintiffs request a one-week extension to respond to the first motion to dismiss (ECF #11), and a two-week extension to respond to the second motion to dismiss (ECF #12).

This request is made in good faith to accommodate the schedule of Plaintiff's counsel, and because of the close proximity of the two deadlines. This request is not made for the purpose of delay, and will not result in any undue delay or prejudice. Accordingly, the Parties have agreed and stipulate that the deadline for Plaintiff to respond to the first motion to dismiss (ECF #11) will be on or before November 19, 2020, and the deadline for Plaintiff to respond to the second motion to dismiss (ECF #12) will be on or before November 30, 2020.

DATED this 10th day of November, 2020.

DATED this 10th day of November, 2020.

BY: /s/ Matthew C. Piccolo
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IT IS SO ORDERED:

Dated: November 10, 2020.



UNITED STATES DISTRICT JUDGE